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IRIS Y. MARTINEZ
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

BARBARA BURRELL,)
)
Plaintiff,)
)
v.) No.
)
MACY'S RETAIL HOLDINGS, LLC,)
and BLUE CHIP 2000 COMMERCIAL)
CLEANING, INC.,)
)
Defendants.)

COMPLAINT

COUNT I – NEGLIGENCE – MACY'S RETAIL
HOLDINGS, LLC

Plaintiff BARBARA BURRELL, through her attorneys, DUNN HARRINGTON,
complaining of Defendant MACY'S RETAIL HOLDINGS, LLC (MACY'S), states as follows:

1. On and before March 12, 2021, Defendant MACY'S maintained, managed, controlled, and operated the premises located at 1 River Oaks Center Drive, Calumet City, County of Cook, and State of Illinois.
2. On March 12, 2021, Plaintiff BARBARA BURRELL was lawfully on the above-noted premises as a business invitee when she tripped on a mat near an exit and fell, causing injuries. Defendant MACY'S knew or should have known about that dangerous condition.
3. On and before March 12, 2021, Defendant MACY'S owed a duty to Plaintiff BARBARA BURRELL to keep the above-noted premises in a reasonably safe condition.
4. On March 12, 2021, Defendant MACY'S breached its duty and was negligent in one or more of the following ways:
 - a. Failed to maintain the above-noted property in a reasonably safe condition;
 - b. Knowingly permitted the aforesaid condition to remain unreasonably



dangerous; and

- c. Failed to warn the public of the unsafe and dangerous condition noted above.

5. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant MACY'S, Plaintiff BARBARA BURRELL suffered injuries of a personal, permanent, and pecuniary nature.

6. On April 8, 2021, Plaintiff's counsel sent a letter to Macy's demanding that evidence related to the above-noted incident, including video, incident reports, and witness statements, be preserved.

WHEREFORE Plaintiff BARBARA BURRELL prays for judgment against Defendant MACY'S RETAIL HOLDINGS LLC, in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT II – NEGLIGENCE – BLUE CHIP 2000
COMMERCIAL CLEANING, INC.

Plaintiff BARBARA BURRELL, through her attorneys, DUNN HARRINGTON, complaining of Defendant BLUE CHIP 2000 COMMERCIAL CLEANING, INC. ("BLUE CHIP"), states as follows:

1. On and before March 12, 2021, Defendant BLUE CHIP contracted with Defendant MACY's to provide cleaning and maintenance services at the premises located at 1 River Oaks Center Drive, Calumet City, County of Cook, and State of Illinois.

2. On March 12, 2021, Plaintiff BARBARA BURRELL was lawfully on the above-noted premises as a business invitee when she tripped on a mat near an exit and fell, causing injuries. Defendant BLUE CHIP knew or should have known about that dangerous condition and should have remedied it prior to her fall.

3. On and before March 12, 2021, Defendant BLUE CHIP owed a duty to Plaintiff

BARBARA BURRELL to perform its work under the above-noted contract with reasonable care and keep the above-noted premises in a reasonably safe condition.

4. On March 12, 2021, Defendant BLUE CHIP breached its duty and was negligent in one or more of the following ways:

- a. Failed to maintain the above-noted property in a reasonably safe condition;
- b. Knowingly permitted the aforesaid condition to remain unreasonably dangerous; and
- c. Failed to warn the public of the unsafe and dangerous condition noted above.

5. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions of Defendant BLUE CHIP, Plaintiff BARBARA BURRELL suffered injuries of a personal, permanent, and pecuniary nature.

WHEREFORE Plaintiff BARBARA BURRELL prays for judgment against Defendant BLUE CHIP 2000 COMMERCIAL CLEANING, INC., in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

S/Colin H. Dunn
Attorney for Plaintiff

Colin H. Dunn
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312-763-5599
Atty No: 62390

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CLEANING, INC.,)	
)	
Defendants.)	

AFFIDAVIT REGARDING DAMAGES SOUGHT

Colin H. Dunn, being first duly sworn under oath, states as follows:

1. That the affiant is one of the attorneys of record for Plaintiff in this matter.
2. That the total money damages sought in this civil action exceeds the amount of \$50,000.00.

FURTHER AFFIANT SAYETH NOT.

_S/Colin H. Dunn_____

Attorney for Plaintiff

[X] Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that I verily believe the same to be true.